

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Nancy Roell, as executrix of the estate of Gary L. Roell, Sr.,	:	Case No. 1:14-CV-637
	:	
Plaintiff,	:	Judge Beckwith
	:	Magistrate Litkovitz
v.	:	
	:	
Hamilton County, Ohio/Board of Commissioners, et al.,	:	<u>STIPULATED PROTECTIVE</u>
	:	<u>ORDER</u>
	:	
Defendants.		

This stipulated protected order covers all plaintiff medical and mental health records which have been or will be produced in discovery in this case. These records shall be subject to discovery between and among the parties but shall otherwise be kept confidential.

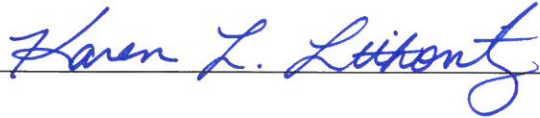
By agreement of the parties, these confidential medical records shall be held strictly confidential by counsel for each party and may only be disclosed to counsel for each party, the parties, witnesses who need to know the material, and expert witnesses retained by counsel for each party. None of the documents covered by this protective order may be disclosed to any other person, or member of the public. If any document subject to this protective order is produced, copied, used in a deposition, or at trial, it shall be marked prominently with the word "CONFIDENTIAL." Any document subject to this order used at trial, in discovery, in a deposition, expert report, pleading, or in any other way so as to make it a potentially public record, it shall be so submitted "under seal" with prior permission of the Court, upon motion and for good cause shown.

This Protective Order does not authorize filing protected materials under seal. No document may be filed with the Court under seal without prior permission as to each such filing,

upon motion and for good cause shown, including the legal basis for filing under seal. *See Procter & Gamble Co. v. Bankers Trust Co.*, 78 F.3d 219 (6th Cir. 1996). Unless the Court orders otherwise, all sealed documents shall be filed according to S.D. Ohio Civ. R. 79.3.

At the conclusion of the litigation, all written materials, including copies made thereof, subject to this protective order shall be returned to counsel who produced the materials.

IT IS SO ORDERED.

A handwritten signature in blue ink, reading "Karen L. Littony", is written over a horizontal line.

Agreed to by:

/s/ Jacklyn Gonzales Martin
Alphonse Gerhardstein (0032053)
Jacklyn Gonzales Martin (0090242)
Attorneys for Plaintiff

/s/ Linda L. Woeber
Linda L. Woeber (0039112)
George Jonson

/s/ Jerome A. Kunkel
Jerome A. Kunkel (0039562)
Mark Vollman
Attorneys for Defendants